

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Hearing Date: December 13, 2023 at 1:00 P.M. ET**

**Objection Deadline: November 28, 2023 at 4:00 P.M. ET**

**Ref. Nos. 3752 & 3757**

**CERTIFICATION OF COUNSEL REGARDING  
DEBTORS' FIFTH (NON-SUBSTANTIVE) OMNIBUS OBJECTION  
TO CERTAIN NO LIABILITY PROOFS OF CLAIM (NON-CUSTOMER CLAIMS)**

I, Kimberly A. Brown, counsel to FTX Trading Ltd. and its affiliated debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On November 13, 2023, the Debtors filed the *Debtors' Fifth (Non-Substantive) Omnibus Objection to Certain No Liability Proofs of Claim (Non-Customer Claims)* [D.I. 3752, redacted & 3757, sealed] (the “Objection”).
2. Pursuant to the *Notice of Objection* attached to the Objection [D.I. 3752-1 & 3757-1], any responses to the Objection were to be filed no later than November 28, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “Response Deadline”).
3. On November 21, 2023, Green Healthy House, LLC (“Green Healthy House”) filed a response to the Objection [D.I. 4087] (the “Green Healthy House Response”).

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

4. As of the date hereof, no other formal objections or other responses to the Objection have been filed or served on the Debtors, besides the Green Healthy House Response.

5. Based on the Debtors' review of the Green Healthy House Response and discussions with the claimant, the Debtors are withdrawing the Objection solely with regard to Green Healthy House's claim without prejudice and with all rights of the parties reserved with regard thereto. The Debtors have revised the proposed form of order (the "Revised Order"), a copy of which is attached hereto as **Exhibit A**, to reflect the withdrawal. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Office of the United States Trustee (the "U.S. Trustee") and the Official Committee of Unsecured Creditors (the "Committee"), who have confirmed that they have no objection to the entry of the Revised Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 7, 2023  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

*/s/ Kimberly A. Brown*

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